

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA :  
v. : CRIMINAL NO. 21-110  
TANNER ROUGHTON : FILED UNDER SEAL

## ORDER

AND NOW, this \_\_\_\_\_ day of October, 2021 it is hereby ORDERED  
that the entire case is hereby UNSEALED, and it is further ORDERED that the Information  
(Doc. No. 1) is UNSEALED; and it is further ORDERED that any other documents which have  
been separately sealed, specifically, letters from defense counsel, the Government's Change of  
Plea Memorandum, and the Guilty Plea Agreement (Doc. Nos. 5, 9, 11, 14) are to REMAIN  
SEALED.

**HONORABLE PAUL S. DIAMOND**  
*Judge, United States District Court*

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**UNITED STATES OF AMERICA :  
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**MOTION TO UNSEAL ENTIRE CASE AND THE INFORMATION  
(AND EXCLUDING OTHER SEALED DOCUMENTS)**

NOW COMES, the United States of America, by its attorneys, Jennifer Arbittier Williams, Acting United States Attorney for the Eastern District of Pennsylvania and Maria M. Carrillo, Assistant United States Attorney for the District, and in support of this Motion states as follows:

1. On or about March 25, 2021, an Information was filed in the Eastern District of Pennsylvania charging the defendant with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349 (Count One), wire fraud, in violation of 18 U.S.C. § 1343 (Count Two), and tax evasion, in violation of 26 U.S.C. § 7201 (Count Three). The entire case was filed under seal, and in addition, the information was filed under seal. Doc. Nos. 1, 2.

2. Other documents have been filed under seal, specifically, letters from defense counsel, the Government's Change of Plea Memorandum, and the Guilty Plea Agreement (Doc. Nos. 5, 9, 11, 14) which reference the defendant's cooperation with the Government.

3. In order to advance the investigation, the Government intends to provide a copy of the Information in this case to others and no longer considers that the entire case must be sealed. However, other sealed documents should remain sealed because they reference the defendant's cooperation with the Government.

4. Accordingly, the Government respectfully requests that (1) the entire case be unsealed, (2) the Information be unsealed (Doc. No. 1), and (3) the other separately sealed documents, specifically, letters from defense counsel, the Government's Change of Plea Memorandum, and the Guilty Plea Agreement (Doc. Nos. 5, 9, 11, 14) that reference cooperation with the Government, remain sealed.

5. Additionally, the government requests that this Motion, the accompanying Order, and all related papers are sealed and impounded.

WHEREFORE, the Government respectfully requests that the Government's Motion to Unseal the Entire Case and the Information (and Excluding Other Sealed Documents) be granted.

Respectfully yours,

JENNIFER ARBITTIER WILLIAMS  
Acting United States Attorney

s/Maria M. Carrillo  
MARIA M. CARRILLO  
Assistant United States Attorney

Dated: October 21, 2021

**CERTIFICATE OF SERVICE**

It is hereby certified that the Government's Motion to Unseal the Entire Case and the Information (and Excluding Other Sealed Documents) was served on the following by electronic mail:

Zane David Memeger, Esquire  
Zane.Memeger@morganlewis.com  
Counsel for the Defendant, Tanner Roughton

s/Maria M. Carrillo  
MARIA M. CARRILLO  
Assistant United States Attorney

Date: October 21, 2021